

Commercial Recycling in Wisconsin

Moving Beyond the Status Quo

*A framework of strategies to increase
recycling rates among Wisconsin's businesses*



*Prepared for the Wisconsin Department of Natural Resources
by Recycling Connections Corporation
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Executive Summary

Process: In the spring of 2006 the Wisconsin Department of Natural Resources solicited proposals for this project to assist in developing the framework for a successful local government (Responsible Unit) commercial (business) recycling program. Recycling Connections Corporation (RCC) was selected and began the project in August. RCC further subcontracted with Midwest Recycling Association and WasteCap Wisconsin for some project assistance.

The final report and recommendations are based on input from municipal recycling officials, hauling industry representatives and recycling non-profit recycling organizations, as well as the experience and knowledge of RCC staff. It is important to note that the research portion was conducted to provide a summary of key and most significant efforts, not an inventory of all efforts. Four listening sessions were offered in Eau Claire, Waukesha, Oshkosh and Rhinelander in the fall of 2006. Responsible Units (RUs) and other municipalities, private haulers, non-profit organizations, businesses and DNR staff were invited and 23 participants attended. A survey was also issued electronically to all RUs with available email addresses to gather additional information and nineteen responded. Twelve municipalities were contacted specifically based on awareness of their commercial recycling successes and/or challenges. They also represented a variety of sizes and governmental levels.

Four Midwest states (Illinois, Iowa, Minnesota and Nebraska) were contacted by phone and/or in writing to learn about their commercial recycling efforts, including funding, education and enforcement. Direct contact was made with representatives from private waste and recycling haulers, both that own landfills and those that do not.

Statewide and National Survey Results: In Wisconsin the most successful efforts were found in larger RUs (i.e. counties or larger cities) or when RUs worked together in regional efforts. Smaller RUs, such as rural towns and villages, found education and enforcement related to commercial recycling extremely challenging due to lack of staff time and/or available funding.

Recycling programs and efforts varied greatly in the states surveyed. The successes however provide positive examples for Wisconsin.

Recommended Strategies: In that the DNR requested a set of recommended strategies to serve as the basis for their further efforts to increase commercial recycling, it will be the discretion of the Department if and how these recommendations are integrated into the process. Specific recommendations provided include and/or address the following; Goals, Basic Elements of a Commercial Recycling Program, Funding, Roles of Responsible Units, and Roles of Haulers and Recyclers.

The key recommendations are to establish an Advisory Committee that will develop a 5-year plan for commercial recycling based on the more detailed recommendations provided, to establish a network of regional coordinators to execute education and enforcement activities, and to create a workable framework that inserts recycling/waste management considerations into the basic infrastructure of doing business in Wisconsin.

The strategies are based on working with RUs, who have expressed their willingness to improve commercial recycling efforts provided that they receive assistance and guidance, yet they should not have sole responsibility for these efforts. Developing partnerships, cooperation and communication between all stakeholders is essential to come up with solutions that will work

National Commercial Recycling Efforts

Key contacts in four Midwest states; Iowa, Illinois, Minnesota and Nebraska; were interviewed regarding commercial recycling education and enforcement efforts made in each respective state. Activities in these states as well as the relative successes and failures can serve as learning opportunities for Wisconsin.

IOWA

For more information visit www.iowadnr.com/waste/

Program Function

The majority of recycling education in Iowa is provided by local solid waste agencies. These efforts encompass training and provide various types of waste management services, including recycling services. Additionally, the Iowa Recycling Association contributes to the educational effort. Businesses receive education and information through the Pollution Prevention Services/P2 Intern and Iowa Waste Exchange programs. These programs have been successful, though are limited in their inability to reach all businesses.

Enforcement

Iowa has implemented the Iowa Waste Exchange as an alternative to commercial enforcement activities. The program includes the following:

- Free, confidential and non-regulatory assistance to businesses
- Promotion through word of mouth as a result of successes and other direct marketing
- Opportunity to actively offer resources to businesses instead of penalizing them
- Exchange staff maintain current market databases and offer practical solutions to businesses depending on their commodity and location
- Each locality matches the amount spent in their jurisdiction. Not cost-intensive compared to the level of diversion that takes place.

The Waste Exchange has saved business approximately \$2.4 million in disposal costs and has diverted approximately 75,000 tons of materials from landfills each year from 2002 through 2005.

Funding

The Iowa Waste Exchange is funded by the state using landfill tipping fees. The monies are distributed and prioritized through a partnership between the Department of Economic Development, Department of Natural Resources and the Iowa Waste Reduction Center.

ILLINOIS

For more information visit www.illinoisrecycles.com

Program Function

Local recycling and solid waste officials undertake a variety of business education efforts locally.

Additionally, the Illinois Department of Commerce and Economic Opportunity (DCEO) provides an annual grant to support business recycling education efforts undertaken by the Illinois Recycling Association (IRA). This funding supports IRA's annual conference and has also allowed them to undertake specific training tasks, such as developing a Best Practices Manual for Recycling Processing Facilities and for Drop-Off Recycling Centers. IRA has held training courses promoting these best practices. DCEO also maintains a Small Business Environmental Assistance Program.

Funding

All grants are funded through Illinois DCEO. DCEO's Illinois Recycling Grants Program requires a promotion and education component. Businesses targeted by grantees will be exposed to a recycling message.

Enforcement

Chicago's City Council adopted the Workplace and Residential Recycling Ordinance in 1994, requiring all property managers and building owners to implement an effective recycling program by January 1, 1995. The City regularly inspects businesses to ensure compliance and issues citations for noncompliance. The City of Chicago has a commercial recycling ordinance.

In 1994, Peoria County passed a county-wide ordinance that mandates all businesses to recycle two items from their waste stream. Other smaller communities have passed similar laws.

Ultimately, the Illinois EPA can take action against non-compliant businesses.

MINNESOTA

For more information visit ramrecycle@comcast.net and www.recycleminnesota.org

Program Function

The Minnesota Technical Assistance Program (MnTAP) at the University of Minnesota offers a statewide business waste exchange, called the Minnesota Materials Exchange. Minnesota Waste Wise, a program of the Minnesota Chamber of Commerce offers waste audits and technical assistance. Counties are the responsible units in Minnesota and the Twin Cities metro counties often offer technical assistance as well. The state provides annual grants to MnTAP and Minnesota Waste Wise. Counties also receive "SCORE" grants from the state annually and counties are encouraged to provide commercial waste assistance.

The MN Pollution Control Agency (MPCA) has introduced the concept of Resource Management Contracting to give incentives to haulers to help their customers reduce and recycle their waste.

Enforcement

Business recycling is encouraged but not required, but individual cities and counties can require recycling by ordinance. The Solid Waste Management Tax of 17% on commercial garbage is a significant incentive for larger businesses to recycle but it is often hard for smaller businesses to see the savings on their bill. Markets have been strong enough that large waste generators have an incentive to recycle and they request services from haulers. It is more problematic for smaller businesses, who may not know what services they need and what the costs and benefits will be.

NEBRASKA

Program Function

Business recycling efforts in Nebraska are occurring on the local level and are infrequent. Non-profit organizations currently lead the efforts. Presently, the commercial sector is not required to recycle materials generated within their businesses, though they are encouraged by local recyclers to recycle. Most parts of the state have experienced greater participation from this sector as businesses start to correlate the significance between participation, diversion savings and developing stronger recycling programs.

Current Wisconsin Commercial Recycling Programs

Twelve Responsible Units (RUs) were surveyed to determine the level and type of activity existing in Wisconsin regarding commercial recycling. Of these, 2 are not active at any level and the remaining are active at various levels. The following overview is presented for general informational and background purposes related to the recommendations in this report.

Types of Programs and Initiatives

Communities throughout Wisconsin have established varying levels of commercial recycling education and enforcement programs. Below is a cross-section of those efforts, representing the current trends of these programs and initiatives.

➤ Northwest Wisconsin:

- Burnett and Washburn Counties conducted **business inspections of motels** in 2006 and will begin to prioritize and expand into additional sectors in 2007. County agents issued letters to several business sectors describing commercial recycling requirements and notifying them of possible inspections.
- St. Croix and Dunn Counties have established a **successful multi-unit family housing recycling education** program in 2005-2006. Additionally, both have developed **school recycling education** programs, including meetings with schools and distribution of resources and tools.
- In Pierce County, waste and recycling haulers provide basic business recycling education as part of their service contracts. County agents **respond if a business requests information** or assistance.
- In 2001, Polk County implemented an enforcement program for all **convenience stores** in the county. Site inspections include distributing educational materials about business requirements under the county's recycling ordinance and local hauler information.
- Chippewa County has conducted a comprehensive commercial recycling education program since 2001. They have targeted **convenience stores; bars & restaurants; and large events** in the county.

➤ Southeast Wisconsin

- The City of Milwaukee enforces the commercial recycling requirements of their local ordinance on a **complaint basis**. They also offer customized information and assistance when approached by a business or other entity. Additionally, the city has successfully worked with small and large **special event venues** to implement recycling collection.
- Waukesha County enforces their local ordinance on a complaint basis. They provide informational support to local businesses through outreach to local **chambers of commerce and trade associations**. Businesses and other institutions, including schools, also can receive comprehensive on-site assistance through **waste assessments** offered by the county.

➤ South Central Wisconsin

- The City of Madison **provides recycling collection** to any business that requests it as long as they abide by the same curbside collection rules in place for residents. Currently 500-600 businesses use the service. The city responds to requests from businesses as well as complaints to ensure compliance with their recycling ordinance.

Program Components

The following resources, tools and strategies have been attributed to enhancing the success of commercial recycling education programs and initiatives in Wisconsin.

- Sector-specific fact sheets developed by the WI Department of Natural Resources (DNR).
- DNR regional staff expertise and authority to assist with local ordinance enforcement.
- Recycling Efficiency Incentive (REI) Grant funding
- Materials outlining business requirements under local ordinances and state law
- Hands-on assistance (by local municipal staff, DNR agents or non-profit agency staff) to decipher requirements and offer solutions for educating staff and customers as well as finding markets for generated materials
- Imposing limitations on frequency of municipal-sponsored garbage collection (encourages recycling and other source reduction practices)

Barriers

The following issues have been identified by RUs as barriers to developing or sustaining effective commercial recycling education campaigns.

- Insufficient funding, resulting in insufficient number of staff and resources to sustain effective programs. Many communities believe that the current funding system does not provide RUs with sufficient funds to adequately address commercial education needs in their communities as an addition to residential education efforts.
- Hauling companies are believed to often neglect informing their commercial customers about recycling requirements. Also in some cases, customers feel that haulers elevate pricing for recycling services, creating a disincentive for participation.
- Turnover of site managers or owners at multi-unit family buildings and the transient nature of their residents can create information gaps and affect the consistency of established programs.
- The perception that recycling collection is not economically beneficial for small to medium businesses, coupled with actual economic disincentives, often restricts the effectiveness of education programs.
- Inconsistency in education materials or enforcement standards throughout the state give conflicting messages to businesses who operate throughout the state or communicate with others in their industry about their responsibilities, resources available to them and the consequences for noncompliance.
- There is insufficient information about the financial incentives for resource recovery as well as an inadequate network of markets for recovered materials.

Recommended Strategies

1. Goal Statement

Results of the Wisconsin Statewide Waste Characterization Study (2003) found that industrial, commercial and institutional sources (hereon referred to as commercial) generated 44% of the total municipal solid waste (MSW) stream, or approximately 2.1 million tons/year. Of this commercial volume, the highest single commodity was paper at 25.8% or 541,213 tons per year, demonstrating its potential for recycling.

While the economy and technological changes may affect future generation of waste and potential recyclable volumes, it is recommended that more specific goals be developed related to commercial recycling for the next five years.

Objectives:

- Verify current levels of participation / recovery within targeted sectors to develop benchmarks for the future. (Measurement could be a commodity per sector approach).
- Develop mechanisms that move recycling/waste management considerations into the infrastructure of doing business in Wisconsin.
- Ensure a more holistic approach for education and enforcement of commercial recycling that involves more state agencies, trade associations and business groups.
- Develop more efficient and effective methods to utilize current state funding opportunities.

2. Basic Elements of Wisconsin's Commercial Recycling Program

2.1 Establish an Advisory Committee to Develop a 5-Year Plan

This report provides the foundation for developing a successful commercial recycling program in Wisconsin. It does not, however, provide all the details for full implementation. It is recommended to establish an Advisory Committee of key stakeholders that will help ensure the effectiveness of the state's efforts and help promote continued collaboration and communication between stakeholders so recycling becomes integrated in Wisconsin's infrastructure.

Committee Purpose:

- Develop a 5-year plan based on the recommendations of this report and the Governor's Blue Ribbon Task Force Report on Waste Materials Recovery and Disposal (2007) (*Referred to as the "Governor's Task Force Report" in this document.*)
- Monitor and evaluate the statewide program's efforts
- Improve communication between stakeholders
- Develop Requests for Proposals (RFPs) for education and outreach programs

The following organizations/entities should be encouraged to participate:

- WI Department of Natural Resources
- WI Department of Commerce
- WI Department of Revenue
- WI Department of Tourism
- WI Housing & Economic Development Authority
- UW- Extension - Solid and Hazardous Waste Education Center
- Wisconsin Manufacturers and Commerce

- Private Waste and Recycling Hauling Companies
- Trade Associations (Hospitality, Insurance, Grocers, etc.)
- Local Chamber of Commerce or Business Councils
- Wisconsin Towns Association
- Wisconsin League of Municipalities
- Wisconsin County Solid Waste Management Association

The Committee should be established by July, 2007. The Committee structure and meeting timelines will be determined by the committee members.

Note: Non-profit organizations (Associated Recyclers of Wisconsin (AROW), Solid Waste Association of North America (SWANA), Recycling Connections Corporation (RCC), WasteCap WI, Midwest Recycling Association (MRA), National Solid Waste Management Association (NSWMA), etc.) should be encouraged to participate with the committee and its activities with the exception of developing actual RFPs for services considering they may be potential applicants.

2.2 Establish Regional Coordinators

Many Wisconsin communities, serving as the Responsible Units for recycling activities, have initiated commercial recycling education and enforcement programs (*see the Current Wisconsin Commercial Recycling Programs section of this report*). These communities, as well as those who have not begun work in this arena, are ready to raise commercial recycling to the forefront of their activities. To do so, however, they are seeking for guidance from the state and greater access to funding and resources.

To increase efficiencies and make the efforts more comprehensive and effective, it is recommended the DNR establish solid waste/recycling Regions that would be served by a Regional Coordinator. Regional Coordinators would conduct education and enforcement on behalf of the RU and could be staff from the DNR, UW-Extension, current RU staff or non-profit organizations. These coordinators could provide the necessary staff support to implement the programs and utilize the available materials. These coordinators could also be a part of a potential statewide waste exchange program that is further described below.

Details of how the Regional Coordinator would serve each of its member communities and how the system would be set up and/or funded (REI grants or cooperative use of basic grant funds) to meet education/enforcement needs would need to be established.

NOTE: This recommendation parallels the Governor's Task Force Report's recommendation "to promote effective solid waste planning and implementation as well as regional cooperation for both".

2.3 Identify Key Target Sectors and/or Commodities

Below are recommendations addressing targeted sectors and commodities. A targeted approach will help focus efforts, develop appropriate outreach and communication materials and ensure an orchestrated statewide approach. Identifying the final targeted sectors may be based on their relative impacts to the waste stream or the type of commodity they primarily produce (i.e. the insurance industry and paper). A commodity should be identified based on its proliferation in the

landfill, whether it is currently a banned material or if its significance is based on the rate it is being used and disposed (i.e. electronic materials).

Recommended Targeted Sectors:

- Multi-family residences
- Schools
- Public places & festivals
- Lodging industry
- Insurance companies and attorney offices (to target paper recycling)

Recommended Targeted Commodities:

- Paper- both office and mixed
- Food waste and/or organics

2.4 Outreach and Communication

Identify Audiences

Effective communication and outreach for commercial recycling in Wisconsin must involve as many affected stakeholders or audiences as possible.

Primary audiences, groups who will perform the relevant actions, will include Responsible Units (RUs), haulers, recycling markets and facility managers, DNR and other state departments, UW-Extension, non-profit organizations, and trade associations.

Secondary audiences, groups whose needs and actions are influenced by the primary audiences, include business owners and managers, property management companies, and cleaning service providers.

Tertiary audiences, groups whose needs and actions are influenced the secondary audiences include employees, maintenance staff, customers, and multi-family residents.

Develop Training Opportunities & Materials for WI DNR, Responsible Units and Haulers

The following steps are recommended to ensure that complete and accurate materials are developed with consistent messaging and that they are widely distributed. A one to two-year phase in period should be implemented for each resulting marketing effort.

- **Organize focus groups** to help establish regional approaches and materials (in line with the principles of community-based social marketing) that will include RUs, affected sectors and stakeholders (including haulers, cleaning staff, property management companies, personnel, customers, etc.), to develop more ownership of the specific marketing process and materials.
- DNR should establish an **RFP process to solicit education and outreach projects** that meet the goals and objectives of the program. Within this process, the DNR should encourage the use of business marketing and community-based social marketing techniques and provide for a minimum 6-week response time to these RFPs that will allow for more thorough project development.

- **Conduct workshops for RUs** to provide training regarding education and enforcement. This will engage them in the process and serve as a method to gather their knowledge regarding outreach to a specified sector or regarding a specific commodity.
- **Establish an online warehouse** for sharing current and new educational materials and programs. This resource can serve as a central repository of existing and newly developed templates, tools, tips and resources for RUs, non-profit organizations, trade organizations and other key stakeholders to use in their outreach and education of the commercial sector. The library of information can be maintained either by a state agency, such as the DNR, or by a third party entity. The above mentioned RFP process could be used to determine who will develop and maintain the warehouse as well as the scope of its function.
- Explore the feasibility of establishing a **Wisconsin Waste Exchange**. This could be based on the model developed in Iowa as described in the *National Commercial Recycling Efforts* section of this report.
- **Ensure that the hauler notification requirement under the recycling law is being enforced** (whether by regional coordinators or DNR). Additionally, training workshops should be developed for RUs and other groups who work closely with business groups regarding contracting and working with haulers. These entities can also educate the customers of what the hauler's requirements are, how to negotiate with those entities, how to read a contract, and what should be the contract's components under state law. Haulers and DNR staff should be consulted to ensure accuracy of presented information.
- Consider developing a **performance-based evaluation system** regarding a RU's commercial recycling efforts that is relative to the circumstances of each community and based on its size and geographical location.

Training & Materials for Targeted Sectors

To reach the secondary audience in this effort, the businesses whose behavior and participation is sought for change, training opportunities and resource materials should be developed and/or enhanced and distributed in a way that is consistent throughout the state within their sector. This will then give the business owners and managers the necessary tools to communicate to the tertiary audiences; their personnel, customers, suppliers and haulers.

- Materials and messages should **encourage and empower employees and customers** to promote and monitor commercial recycling efforts. This will help create a new expectation of recycling as a standard for all aspects of life; whether at home, school, work, shopping or play. While education campaigns may emphasize a specific commodity for a sector, information should still provide information about all banned materials.
- Communication with businesses should **address the perceptions and/or realities that recycling may cost more than disposal**. Where ever possible, cost saving opportunities should be explored and encouraged.

2.5 Legislative & Enforcement

In addition to the recommended communication and outreach efforts, legislative and increased enforcement efforts could provide further incentive for commercial recycling efforts. The following are few options to consider:

- Add **mixed paper to commercial recycling requirements** (also a Governor's Task Force recommendation) which will allow more recycling options and help increase recycling volumes.
- Require businesses to **develop a Solid Waste Management Plan** and to report this plan to a state agency or their RU on an annual basis. RUs could access the information of their local businesses and respond to those who fail to report or are not meeting their requirements. This could also provide a specific benchmark for RUs enforcement. Developing plans will result in businesses becoming self-educated on their requirements and offers the potential for them to find cost efficiencies and develop innovative best management practices. Additionally, the process would require communication between the DNR, the Department of Commerce and other related agencies that would result in a more complete process. Additional considerations:
 - Allow an enforcement grace period for businesses that still need to establish programs or need to bring them up to full compliance.
 - Work with trade associations and chambers of commerce to ensure information is correct and to provide trainings and templates for plan development.
 - Make this part of the permitting process with a check a box for self certification. This could then be available to RUs to use for enforcement and education/outreach purposes.
- Develop a **sector-specific enforcement/education approach**. This effort, ideally structured in a one to two-year phase-in period, would operate in conjunction with the education and outreach recommendations described above. Press and media outlets should be used to highlight the successes and potential shortcomings of business-related recycling programs.
- **Enforcement Discretion** may occur at times due to limited DNR and RU staff; however do not make it an official policy. An official DNR policy would not be equitable for RUs and would reduce RUs' motivation for improving local programs.

3. Funding

Funding sources must be identified to assure there is adequate funding for the initiatives recommended in this report. Yet this report does not recommend that new funds be collected, but rather that current funding sources and mechanisms be used more completely, efficiently and in more effective ways. With this consideration programs could be developed with longer-term goals..

In preparing this report RUs continually shared that it is difficult or nearly impossible to expand their commercial recycling education and enforcement efforts using only the Basic Grant funding as currently provided. Especially for smaller RUs, their efforts tend to mostly focus toward the residential sector. In order to reach the commercial sector additional funds must be made available for staffing and communication. Specific recommendations include:

- The Advisory Committee should provide further recommendations on funding levels and sources; however it is anticipated that both Recycling Efficiency Incentive and Basic Grant funds be used. To encourage accountability and cost effectiveness regional approaches and programs are recommended.
- Furthermore, it is recommended that the Basic Grant funding mechanism be modified in order to return more funds to municipalities which thus could be used for commercial

recycling education and/or enforcement, and allow these funds to be used for both mandated and non-mandated materials such as organics, electronics and construction/demolition. This would allow RUs to take advantage of more opportunities to increase recycling rates and reduce waste disposal.

- Furthermore, state funds collected for recycling should not be used for non-recycling related activities. It is also recommended that a uniformly approved definition of “recycling-related activities” is developed.
- Consider changing current REI grant requirement that RUs initiate either a new project or add a new partner on an annual basis. This limits the ability to develop longer-term projects and does not provide enough time to evaluate alternate funding sources that could help sustain the project. Revisions to the grant program, including establishing new bench marks for a project, could help promote efficiencies even further.
- Explore the concept of the DNR using a portion of the REI designated funds to further disseminate educational materials and develop education programs, such as those mentioned in Section 2.4 of this report, on a state level for the benefit of all RUs.

Note: The Governor's Task Force Report supports maintaining recycling funds for recycling, and does not make recommendations for changing current funding sources or amounts. The group recommends that the surplus that has been collected be used to implement their recommendations. It also recommends changing the basic grant formula to make distribution more equitable.

4. Roles of Responsible Units

Wisconsin's Responsible Units (RUs) will have a key role with building or establishing commercial recycling programs in their jurisdiction, however they should not have the sole responsibility. The lead role should be assumed by the proposed Advisory Committee as well as the DNR. The RU will be responsible for assuring that education and enforcement efforts are in place, and can further work with Regional Coordinators, haulers, DNR, and non-profit organizations to accomplish these tasks.

More specific recommendations include:

- **Establish minimum levels** for RUs' commercial recycling education and enforcement efforts (i.e. inspect a certain percentage per year).
- State that **RUs are responsible for assuring that an enforcement plan is in place**; however allow them to work with the DNR, Regional Coordinators, and/or contracted staff to implement the plan and actual enforcement activities.
- **Encourage RUs to revise their local ordinances to require haulers to report** volumes by weight to the RUs and/or require businesses to establish and implement Solid Waste Management Plans (as described previously) and report their results annually to the RU.
Note: Some members of the hauling industry state there are difficulties in tracking volumes per business however this kind of information is collected at some level in Minnesota and could provide guidance for Wisconsin's efforts.

5. Roles of Haulers & Recyclers

The primary role for haulers and recyclers should be educational and informational; not enforcement. These entities, including waste and recycling haulers, private recycling service providers (such as paper shredding companies, municipal MRFs accepting materials directly from businesses), recycling brokers and recycling end markets can however provide “eyes and ears” for the RUs that legally are responsible for enforcement and become a key link to the business community. The requirement that haulers notify their customers of their recycling requirements is a positive step, yet some RUs question the effectiveness of this method as a way to truly educate businesses. The common question is; “Was the notification received by the correct person within the business that will make decisions regarding solid waste and recycling?”

A further consideration is to require haulers to submit an annual report to the DNR, and/or to RUs where they operate, regarding business participation and recycling volumes.

Conclusions

The recommended strategies listed in this report will provide the Wisconsin Department of Natural Resources with a variety of methods to increase commercial recycling in Wisconsin. Taking the next steps is critical to build on the interest and momentum for increasing commercial recycling that this report has generated. Furthermore, establishing an Advisory Committee dedicated to this goal will provide additional guidance and assistance for the Department’s future efforts.

In developing this set of recommendations it became evident that partnerships, cooperation and communication are all essential to come up with solutions that work. No one entity is solely responsible for commercial recycling; to be successful it must be a cooperative effort. Encouraging regional approaches will help make these efforts more effective and cost efficient. The RUs also are ready and willing to work on improving commercial recycling, yet they are looking for the guidance and direction from state agencies.

Another evident point is that education and enforcement activities must be continuous and sustainable to truly be effective. The commercial sector is ever-changing and growing. With this in mind, recycling education and enforcement efforts must be ongoing, creative and visible in order to reach our goals.